

**UNITED STATES DEPARTMENT OF LABOR
OFFICE OF ADMINISTRATIVE LAW JUDGES**

OFFICE OF FEDERAL CONTRACT
COMPLIANCE PROGRAMS, UNITED
STATES DEPARTMENT OF LABOR,

Plaintiff,

v.

GOOGLE, INC.,

Defendant.

OALJ Case No. 2017-OFC-00004

OFCCP No. R00197955

PLAINTIFF'S THIRD REQUESTS FOR ADMISSION TO DEFENDANT GOOGLE INC.
Case Subject to Expedited Proceedings under 41 C.F.R. § 60-30.31

Pursuant to 41 C.F.R. § 60-30.9(b), Plaintiff Office of Federal Contract Compliance Programs, United States Department of Labor ("OFCCP") propounds the following requests for admission on Defendant Google Inc. As required by § 60-30.9(b), Google must respond to the requests below within 25 days of the date these requests are served.

DEFINITIONS

1. The terms "YOU" or "YOUR" refer to Defendant Google Inc.
2. OFCCP refers to Plaintiff, Office of Federal Contract Compliance Programs.

REQUESTS FOR ADMISSION

REQUEST FOR ADMISSION NO. 36:

Admit that, since at least June 4, 2014, YOUR legal department includes at least 1,000 employees.

REQUEST FOR ADMISSION NO. 37:

Admit that, since at least June 4, 2014, YOU have tracked how many individuals from

outside legal providers have worked on this case.

REQUEST FOR ADMISSION NO. 38:

Admit that, since at least June 4, 2014, YOU have tracked the seniority of individuals from outside legal providers who have worked on this case.

REQUEST FOR ADMISSION NO. 39:

Admit that, since at least June 4, 2014, YOU have tracked the total cost from outside legal providers of the litigation in this matter.

REQUEST FOR ADMISSION NO. 40:

Admit that, since at least June 4, 2014, YOU have retained at least two partners and two associates from the law firm Jackson Lewis P.C. to represent YOU in this matter.

REQUEST FOR ADMISSION NO. 41:

Admit that, since at least June 4, 2014, YOU have paid any partner you employed from Jackson Lewis P.C. at least \$550 per hour for their legal services to represent you in this matter.

REQUEST FOR ADMISSION NO. 42:

Admit that, since at least June 4, 2014, YOU have paid any associate you employed from Jackson Lewis P.C. at least \$300 per hour for their legal services to represent you in this matter.

REQUEST FOR ADMISSION NO. 43:

Admit that, since at least December 29, 2016, YOU have paid (or if not fully paid, you owe) counsel and support staff from Jackson Lewis P.C. at least \$300,000 to represent you in this matter.

REQUEST FOR ADMISSION NO. 44:

Admit that, since at least June 4, 2014, YOU have spent at least \$50,000,000 per year on free food for YOUR employees at YOUR Mountain View, California campus.

REQUEST FOR ADMISSION NO. 45:

Admit that, since at least June 4, 2014, YOU have spent at least \$10,000,000 per year on lobbying activities at the state and federal level.

REQUEST FOR ADMISSION NO. 46:

Admit that, in 2016, YOU gave at least \$60,000,000 to non-profits.

REQUEST FOR ADMISSION NO. 47:

Admit that, for the calendar year 2016 (ending December 31, 2016), YOU (Google, Inc.) were responsible for 99.1% of Alphabet, Inc's revenue.

REQUEST FOR ADMISSION NO. 48:

Admit that, as of December 31, 2015, YOU had cash and cash equivalents totaling \$16,549,000,000.

REQUEST FOR ADMISSION NO. 49:

Admit that, for the calendar year 2015 (ending December 31, 2015), YOU earned \$16,348,000,000 net income.

REQUEST FOR ADMISSION NO. 50:

Admit that, for the calendar year 2016 (ending December 31, 2016), YOU earned \$23,716,000,000 net income.

REQUEST FOR ADMISSION NO. 51:

Admit that, in 2007, YOU were the subject of a compliance review by OFCCP of YOUR Mountain View, California campus.

REQUEST FOR ADMISSION NO. 52:

Admit that, in 2011, YOU were the subject of a compliance review by OFCCP of YOUR New York, New York campus.

REQUEST FOR ADMISSION NO. 53:

Admit that, in 2012, YOU were the subject of a compliance review by OFCCP of YOUR Chicago, Illinois campus.

REQUEST FOR ADMISSION NO. 54:

Admit that, in 2010, YOU were the subject of a compliance review by OFCCP of YOUR Santa Monica, California campus.

REQUEST FOR ADMISSION NO. 55:

Admit that, in 2010, YOU brought suit against the United States federal government seeking to require the Department of the Interior to permit YOU to bid for a contract to provide messaging services to the Department.

REQUEST FOR ADMISSION NO. 56:

Admit that, between 2012 and 2017, YOU were awarded more than \$50,000,000 in federal contracts and subcontracts.

REQUEST FOR ADMISSION NO. 57:

Admit that, in 2015, YOU were awarded more than \$1,000,000 in federal contracts.

REQUEST FOR ADMISSION NO. 58:

Admit that, in 2016, YOU were awarded more than \$6,000,000 in federal contracts.

REQUEST FOR ADMISSION NO. 59:

Admit that, in 2017, to the present, YOU have been awarded more than \$2,000,000 in federal contracts.

REQUEST FOR ADMISSION NO. 60:

Admit that the letter attached as Exhibit A to these Third Requests for Admissions is a true and correct copy of a letter that you caused your attorneys from Jackson Lewis P.C. to send

to OFCCP.

REQUEST FOR ADMISSION NO. 61:

Admit that the letter and conciliation agreement attached as Exhibit B to these Third Requests for Admissions is a true and correct copy of the letter and completed conciliation agreement that YOU received from OFCCP.

REQUEST FOR ADMISSION NO. 62:

Admit that the bid protest Complaint attached as Exhibit C to these Third Requests for Admissions is a true and correct copy of a Complaint YOU filed in the Federal Claims court.

Date: March 24, 2017

NICHOLAS C. GEALE
Acting Solicitor of Labor

JANET M. HEROLD
Regional Solicitor

IAN ELIASOPH
Counsel for Civil Rights

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Senior Trial Attorney

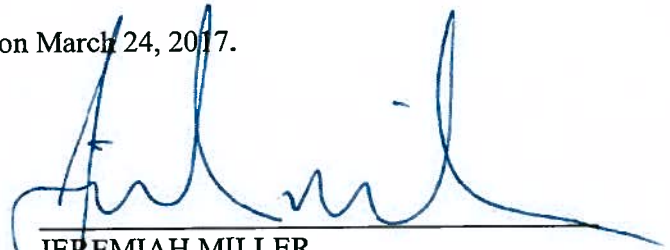
CERTIFICATE OF SERVICE

I am a citizen of the United States of America. I am over eighteen years of age and am not a party to the within action. My business address is 300 Fifth Avenue, Suite 1120, Seattle, Washington 98104.

On March 24, 2017, I served the attached **PLAINTIFF'S THIRD REQUESTS FOR ADMISSION TO DEFENDANT GOOGLE INC. AND EXHIBITS A-C** on Defendant Google Inc. through serving its attorneys below via electronic mail, pursuant to the parties' agreement:

Duff, Daniel V., III (Daniel.Duff@jacksonlewis.com);
Camardella, Matthew J. (CamardeM@jacksonlewis.com);
Sween, Lisa Barnett (Lisa.Sween@jacksonlewis.com);
Raimundo, Antonio (Antonio.Raimundo@jacksonlewis.com);
Suits, Eric (Eric.Suits@jacksonlewis.com)

I declare under the penalty of perjury that the foregoing is true and correct and that this declaration was executed in Seattle, Washington on March 24, 2017.



JEREMIAH MILLER
Senior Trial Attorney